

November 21, 2016

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *Numbering Policies for Modern Communications*, WC Docket No. 13-97, *IP-Enabled Services*, WC Docket No. 04-36, *Telephone Number Requirements for IP-Enabled Services Providers*, WC Docket No. 07-243, *Telephone Number Portability*, CC Docket No. 95-116, *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *Connect America Fund*, WC Docket No. 10-90, *Numbering Resource Optimization*, CC Docket No. 99-200, *Petition of Vonage Holdings Corp. for Limited Waiver of Section 52.15(g)(2)(i) of the Commission's Rules Regarding Access to Numbering Resources*, *Petition of TeleCommunication Systems, Inc. and IBF Group, Inc. for Waiver of Part 52 of the Commission's Rules*

Dear Ms. Dortch,

On November 17, 2016, Brendan Kasper and Ed Mulligan, of Vonage, and Yuxi Tian and the undersigned, of Harris, Wiltshire & Grannis LLP, met with Ann Stevens, Kris Monteith, Marilyn Jones, and Jean Ann Collins of the Wireline Competition Bureau ("Bureau"). The purpose of the meeting was for Vonage to present an update on its implementation efforts in the months after the Federal Communications Commission ("FCC" or "Commission") granted numbering rights to interconnected VoIP providers.<sup>1</sup>

Vonage discussed its efforts to migrate numbers from numbering partners to Vonage, achieve IP interconnection with other providers, and otherwise implement direct access to numbers. Vonage detailed its successes and implementing direct access, as well as discussing challenges it has faced and strategies for overcoming those challenges. Vonage did not discuss the merits or outcome of the pending appeal of the *VoIP Numbering Order*.<sup>2</sup>

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<sup>1</sup> *Numbering Policies for Modern Communications*, Report and Order, FCC 15-70, 30 FCC Rcd. 6839 (2015) (*VoIP Numbering Order*).

<sup>2</sup> *NARUC v. FCC*, No. 15-1497 (D.C. Circuit filed Dec. 23, 2015). Because Vonage's communication was not "directed to the merits or outcome" of any proceeding, it was not a "presentation" within the meaning of the ex parte rules. 47 C.F.R. § 1.1202(a). Vonage is nonetheless filing this ex parte notice in an abundance of caution and to ensure transparency.

Marlene H. Dortch  
November 21, 2016  
Page 2

Please do not hesitate to contact me at (202) 730-1346, or [bstrandberg@hwglaw.com](mailto:bstrandberg@hwglaw.com), if you have questions or would like additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'BDS' followed by a stylized flourish.

Brita D. Strandberg  
*Counsel to Vonage Corp.*

cc: Meeting attendees